

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

DAVID JENKINS, on behalf of himself and all others similarly situated,	)	
	)	CASE NO. 2:23-cv-1874-ALM-CMV
	)	
Plaintiff,	)	JUDGE ALGENON L. MARBLEY
	)	
vs.	)	MAGISTRATE JUDGE CHELSEY M.
	)	VASCURA
EVO SERVICES GROUP, LLC,	)	
	)	
Defendant.	)	
	)	

**PROPOSED CASE SCHEDULE**

In light of the Court's *Opinion and Order Granting the Parties' Joint Motion for Court Supervised Notice* (Dkt. #21) and its prior instruction to submit a proposed case schedule after ruling on the parties' *Joint Motion* (Dkt. #14), the parties respectfully submit their *Proposed Case Schedule*. The *Proposed Schedule* is made in light of the opt-in period, which ends March 12, 2024.<sup>1</sup>

- Proposed Fact Discovery Cutoff: **July 15, 2024** (4 months after close of the opt-in period);
- Proposed Dispositive Motion Deadline: **August 15, 2024** (1 month after the discovery cutoff);
- Proposed Expert Disclosures: **1 month after the Court's ruling on dispositive motions or January 31, 2025** – *whichever is later*;
- Proposed Rebuttal Expert Disclosures: **1 month after Proposed Expert Disclosures or February 28, 2025** – *whichever is later*;
- Proposed Settlement Demands due: **August 15, 2024** (1 month after the discovery cutoff);
- Proposed Settlement Responses due: **September 16, 2024** (1 month after demands are due);
- Proposed Settlement Conference Month: **October 2024** (the month after settlement responses are due.)

---

<sup>1</sup> The parties were supposed to submit the *Proposed Case Schedule* by December 12, 2023. Dkt. #14. The parties just realized their error and apologize to the Court.

Respectfully submitted,

/s/Barry Y. Freeman

Barry Y. Freeman (OH Bar No. 0062040)

*Trial Attorney for Defendant*

**ROETZEL & ANDRESS, LPA**

1375 E. 9<sup>th</sup> Street, 10<sup>th</sup> Floor

Cleveland, OH 44114

Phone: (216) 615-4850

Facsimile: (216) 623-0134

bfreeman@ralaw.com

/s/ Robert E. DeRose

Robert E. DeRose (OH Bar No. 0055214)

*Trial Attorney for Plaintiffs*

**BARKAN MEIZLISH DEROSE COX, LLP**

4200 Regent Street, Suite 210

Columbus, OH 43219

Phone: (614) 221-4221

Facsimile: (614) 744-2300

bderose@barkanmeizlish.com